

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



March 17, 2020

Carla J. Peterman  
Senior Vice President, Regulatory Affairs  
Southern California Edison  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

Dear Ms. Peterman:

With this letter, I request that Southern California Edison (SCE) begin making all necessary and proper preparations to implement directives that are reasonably likely to result from a Track 1 Decision in the Microgrids and Resiliency proceeding (R.19.09-009), as already required under California Public Utilities Code, Section 451; General Order 166 and other provisions of law. A stated objective of Track 1 of the Microgrids and Resiliency proceeding is to make necessary programmatic changes that would allow for deployment of more resiliency projects before the 2020 wildfire season. To achieve this goal, SCE must anticipate the impacts on its own operations from directives that could come from the proceedings at the California Public Utilities Commission (CPUC) and be ready to implement them immediately. While SCE should not assume any outcome from the proceeding has already been determined, based on the record in the proceeding, SCE can be taking some “no regrets” actions now to help reduce the impacts of wildfires and Public Safety Power Shutoffs (PSPS) in 2020 and thereafter.

In the Microgrids and Resiliency proceeding, CPUC staff and SCE, among the other large investor owned utilities, have submitted proposals for short term actions that could be accomplished in preparation for the 2020 fire season. The Staff Proposal, along with the SCE proposals dated January 21, 2020, recommended the following short-term actions to accelerate the deployment of microgrids and related resiliency solutions:

- 1) Accelerate Interconnection of Resiliency Projects.
- 2) Modernize Tariffs to Maximize Resiliency Benefits.
- 3) Share Information with Local Government Agencies.
- 4) SCE 2020 Microgrid Pilot

I ask that SCE begin making all necessary and appropriate preparations to implement uncontroversial recommendations such as:

- Meeting and conferring with other industry stakeholders to standardize the single line diagrams used to illustrate interconnection applications. This can be initiated by electric utilities without intervention from the regulator, especially if doing so would expedite approval of interconnections for vital resiliency projects in advance of fire season.
- Requesting and justifying any necessary deviations from SCE’s Rule 21 that would enable SCE to expedite the interconnection of key locations, facilities, and/or customers, including proposing criteria for what projects would be eligible.

- Providing information to local government agencies that would enable local jurisdictions in SCE's service territory to effectuate their respective emergency plans or engaging with them to provide SCE technical support for local government resiliency projects. Examples of activities that SCE could initiate include:
  - Developing more effective internal processes to interact with local and tribal governments.
  - Informing local and tribal governments about SCE's electric transmission and distribution investment and operational plans that would help minimize the use and duration of PSPS events.
  - Holding face-to-face workshops to educate local jurisdictions on electric transmission and distribution infrastructure serving their communities.
  - Developing a resiliency project management guide that would depict how to engage with SCE on resiliency projects and listing a set of best practices for successful project implementation.
  - Providing access to detailed historical PSPS outage data to local and tribal governments to help identify resiliency project development opportunities.

With regards to cost recovery, I also remind SCE that the CPUC previously authorized SCE to track expenditures related to implementation of its wildfire mitigation plans within the Wildfire Mitigation Plan Memorandum Account (WMPMA). SCE may use the WMPMA to track incremental costs incurred to implement an approved wildfire mitigation plan that are not otherwise recovered in SCE's adopted revenue requirements. Such costs may include but are not limited to expenses and capital expenditures for activities such as operational practices and public safety power shutoffs.

In conclusion, I request that SCE prepare itself to respond expeditiously to any directives that arise from the CPUC's Microgrids and Resiliency proceeding. I also remind SCE that it, in parallel with the progress of Track 1 activity in R.19-09-009, must continue to fulfill its obligations under existing laws, rules, and directives to prepare for fire season and reduce the impacts of PSPS events on Californians.

Sincerely,



Alice Stebbins  
Executive Director

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